N60138.AR.003317
FISC WILLIAMSBURG
5090.3a

U S NAVY RESPONSE TO VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS ON THE DRAFT TECHNICAL MEMORANDUM SITE INSPECTION STEP 2 RESULTS AND PROPOSED PATH FORWARD PENNIMAN LAKE FISC WILLIAMSBURG VA
06/03/2015
CH2M HILL

Response to Comments
Penniman Lake
Site Inspection – Step 2 Results and Proposed Path Forward
Draft Technical Memorandum
Naval Weapons Station Yorktown Cheatham Annex
Williamsburg, VA
June 3, 2015

Comments received by email on February 19, 2015 from Wade Smith, Virginia Department of Environmental Protection (VDEQ), following review of the Penniman Lake Site Inspection – Step 2 Draft Technical Memorandum submitted November 6, 2014. (Comments received were directly inserted in the Draft Technical Memorandum text file.)

Note: Per the Partnering Team discussion on May 28, 2015, the Navy intends to conduct an interim removal action at AOC 9 to address the PCB contamination in the northwest area (the details of which will be worked out at a later date) as the next step for the site prior to the continuation of any investigative work.

Comments received from VDEQ via email dated February 19, 2015

VDEQ Comment 1: *Section 2, second paragraph - Please consistently use either the correct one of King Creek or King's Creek throughout the document.*

Navy Response: All references to "King's Creek" will be changed to "King Creek" throughout the document, since this is the correct name for this body of water.

VDEQ Comment 2: *Section 4.4, first paragraph, last sentence - Please include a reference to when this approval was made/documented.*

Navy Response: The last sentence will be deleted and the final sentence of the paragraph will be revised as follows (additional text noted in bold): "This information was used to select ~~a suitable reference pond and associated reference pond~~ **reference** sample locations **within Cheatham Pond (the reference pond preliminarily selected in the Step 2 UFP-SAP [CH2M HILL, 2012c]),** to allow a comparison of site data to reference data for the purpose of discerning potential non-site-related contaminant impacts."

In addition, the second paragraph of Section 4.5 will be revised as follows (additional text noted in bold):

"Based on a reconnaissance survey conducted in Cheatham Pond, five locations were selected to match habitat conditions at Penniman Lake. In addition, five locations were also selected to match habitat conditions at Site 4 (Upstream Pond) and three locations were selected to match habitat conditions at Youth Pond, since field activities for these sites were conducted at the same time as those for Penniman Lake. Based on a review of the preliminary (unvalidated) data, the CAX Partnering Team agreed on **October 25, 2012** not to use the three reference samples **from Cheatham Pond that were to be representative of** Youth Pond **background** due to elevated concentrations of PCBs and metals in sediment. Thus, only the samples collected from Cheatham Pond selected to match habitat conditions at Penniman Lake and Site 4 were used to develop background upper tolerance limits (UTLs). **For the calculated surface water background UTLs, these samples were the ten Cheatham Pond surface water samples associated with Site 4 and Penniman Lake. For the calculated surface sediment UTLs, these samples included the ten Cheatham Pond samples associated with Site 4 and Penniman Lake, as well as, the eight Pond Study samples (Baker, 2001). For the calculated subsurface sediment UTLs, these samples were the five Cheatham Pond samples associated with Penniman Lake.**"

VDEQ Comment 3: *Section 4.4, third paragraph, first sentence - Please include a reference to when this call was made.*

Navy Response: The first sentence will be revised as follows (additional text noted in bold): "After the biological survey was completed, the Partnering Team held a **conference** call **on October 22, 2012** to discuss the amount and types of biota found."

VDEQ Comment 4: *Section 8, eighth bullet - Please include more info on this "Conclusion", specifically as it relates to what "relatively minor" means.*

Navy Response: The text in this bullet will be revised as follows (additional text noted in bold): "The extent of the elevated Aroclor-1260 concentrations in the drainage way leading to the northeast finger of Penniman Lake does not appear to be fully defined; however, the soil and sediment data from this area suggest a relatively minor input of Aroclor-1260 to Penniman Lake sediment from this area **since no concentrations of Aroclor-1260 exceeded the Residential RSL for sediment or the Residential RSL for soil at sample locations downstream of this drainage way in Penniman Lake**. "

All other editorial comments provided by VDEQ throughout the text have been addressed.